



June 17, 2025

VIA ECF

Honorable Ronnie Abrams, U.S.D.J.
U.S. District Court, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 619
New York, New York 10007

Application denied. The parties have had notice of the trial date since January 13, 2025, and of associated pretrial deadlines since February 25, 2025. Accordingly, they shall adhere to the schedule set by the Court in February. To the extent they are able to reach agreement regarding specific issues, they may supplement their submissions after the June 27, 2025 deadline.

SO ORDERED.

Hon. Ronnie Abrams
June 18, 2025

**Re: Michael McConaughey v. The Port Authority of N.Y. & N.J.
No. 21-cv-6137-RA (S.D.N.Y.)**

Dear Judge Abrams:

We represent defendant the Port Authority of NY and NJ in the above-referenced matter. Pursuant to the Court's order dated February 25, 2025, the parties are scheduled to file their pretrial submissions by June 20, 2025. We are writing to request an extension of the deadline to file all pretrial submissions until June 26, 2025 and responses by July 7, 2025. Plaintiff's counsel consents to this request for an extension of the pretrial submission deadlines.

The parties have been working diligently with respect to the preparation of the pretrial submissions; however, an extension is necessary to provide the parties with sufficient time to meet and confer regarding the parties' proposed witnesses and exhibits for trial. Counsel for both parties met yesterday by phone and agreed upon interim deadlines so that we can finalize the pretrial submissions. Defense counsel has a preplanned vacation during the week of June 30-July 4th, which is the reason the responsive deadline filing is proposed for July 7th. The parties believe this additional time will help streamline certain issues that are expected to be raised during trial.

We thank the Court for its consideration and courtesies.

Respectfully submitted,

By: /s/ Cheryl Alterman
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cc: Shane Seppinni, Esq. (via ECF)